

Michael W. Bennett
Director -
Federal Regulatory

SBC Communications Inc.
1401 I Street, N.W.
Suite 1100
Washington, D.C. 20005
Phone 202 326-8890



DOCKET FILE COPY ORIGINAL

March 22, 1996

Written Ex Parte

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: CC Docket No. 95-116

Dear Mr. Caton:

Attached is information regarding interim number portability associated with Southwestern Bell Telephone Company in Texas.

Please call me if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. W. Bennett".

Attachment

cc: Mr. Matt Harthun (w/attachment)

RECEIVED

MAR 22 1996

COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

0+1



~~KK~~ ~~SSB~~ ~~CLK~~

February 20, 1996

FEB 20 PM 3:10
PUBLIC UTILITY COMMISSION
AUSTIN, TEXAS

L. Kirk Kridner
Attorney

Board Certified-
Administrative Law
Texas Board of
Legal Specialization

Ms. Paula Mueller
Secretary of the Commission
Public Utility Commission of Texas
7800 Shoal Creek Boulevard
Austin, Texas 78757

Re: SOAH NO. 473-95-1564 & PUC Docket No. 14940

Dear Ms. Mueller:

Enclosed for filing is the original and seven (7) copies of Southwestern Bell Telephone Company's Response to the First Request for Information from Office of Public Utility Commission, in the above-referenced matter. The Requests for Information were received by Southwestern Bell on January 31, 1996.

Very truly yours,

A handwritten signature in cursive script, appearing to read "L. Kirk Kridner", followed by a long horizontal line.

L. Kirk Kridner
Attorney

Enclosures

CC: Mr. Kevin Zarling, Asst. General Counsel, PUC
Mr. Rick Guzman, Asst. Public Counsel, OPUC
Central Records, PUC
SOAH Secretary
(hand delivered)
Parties of Record
(U. S. Mail)

1616 Guadalupe
Room 600
Austin, Texas 78701-1298

Phone 512 870-5713
Fax 512 870-3420

75

1-1.

Please provide the corresponding LRIC studies (plus all supporting documents, work papers and other analyses) for all rates and charges, recurring and initial non-recurring, that are listed in Southwestern Bell Telephone Company, Local Access Tariff Section 4, Sheets 1 through 7, Interim Number Portability. To the extent that these studies are available for inspection and copying in room 310 at 1616 Guadalupe, Austin, Texas, please indicate for each rate or charge the precise binder and tab containing the corresponding studies. The provided information should include LRIC studies for the following services or rate elements as listed and referenced on sheet 7:

Interim Number Portability Remote

-- Per number ported (recurring and initial non-recurring where applicable.)

-- Per additional paths (recurring and initial non-recurring where applicable.)

Interim Number Portability Direct (recurring and initial non-recurring where applicable.)

-- Service Establishment Charge (recurring and initial non-recurring where applicable.)

per Interim Number Portability-Direct trunk group, per central office (recurring and initial non-recurring where applicable.)

Interim Number Portability Direct Channel Termination Charges

-- Per Interim Number Portability-Direct VG channel termination (recurring and initial non-recurring where applicable.)

-- Per Interim Number Portability-Direct DS1 channel termination (recurring and initial non-recurring where applicable.)

Interim Number Portability Direct Number Charges

-- Per number ported (recurring and initial non-recurring where applicable.)

Interim Number Portability-Direct Transport Charges

-- Per Interim Number Portability Direct VG transport (recurring and initial non-recurring where applicable.)

-- Per Interim Number Portability Direct DS1 transport

(recurring and initial non-recurring where applicable.)

Secondary Service Order Charges, as found in Section 27 of the Texas general Exchange Tariff. (As referenced in footnote 1 of Southwestern Bell Telephone Company, Local Access Tariff Section 4, Sheets 7.)

Answer: Information responsive to this request is in part "Highly Sensitive Confidential Information" subject to the Protective Order in this proceeding. The information will be available for review in Room 310, 1616 Guadalupe, Austin, Texas after execution of the proper Protective Agreement. The material will be available between the hours of 8:00 AM and 12:00 NOON and 1:00 PM and 5:00 PM, Monday through Friday on normal business days. The information can be found in three binders labeled:

Texas

1996 - 1998

Interim Number Portability-Remote

(Remote Call Forwarding)

Texas ..

1996-1998

Interim Number Portability-Direct

Texas

1996-1998

Usage Sensitive Local Connection

Cost Study

The binders labeled Texas 1996-1998 Interim Number Portability-Remote (Remote Call Forwarding) and Texas 1996-1998 Interim Number Portability-Direct contain cost study results as well as the back-up calculations and inputs supporting the cost results.

The cost results are considered to be Highly Sensitive

Confidential because they identify the price floor incurred by Southwestern Bell Telephone Company to provide each of its services. Disclosure of such information would provide competitors an unfair advantage.

Cost factors, labor costs and all supporting documentation are designated Highly Sensitive Confidential because they are based on confidential or private financial, personnel, and business information. Disclosure of such information would provide competitors an unfair advantage.

The Usage Sensitive Local Connection study contains costs for the Voice Grade Channel Termination and the High Capacity Channel Termination. All portions of the study that are considered Highly Sensitive Confidential have been marked as such. The information is considered Highly Sensitive Confidential because the unrestricted release of this information to the public could provide competitors with valuable proprietary information that could be used at an unfair advantage.

Southwestern Bell would submit that the information responsive to this request is exempt from disclosure under the Open Records Act pursuant to Sections 552.101, 552.110, and 552.104. The applicable exemptions include trade secrets or commercial or financial information of Southwestern Bell and, if disclosed, could place Southwestern Bell at a competitive disadvantage.

Counsel for SWBT has reviewed the information sufficiently to state in good faith that this highly sensitive information is exempt from public disclosure under the Public Information Act and merits the Highly Sensitive Confidential Information designation.

Docket No. 14940
Office of Public Utility Counsel
First Request
Information Request No. 1-1
Page 7 of 7
02/20/96

Responsible Person: Barbara A. Smith
Area Manager-Product Cost Development,
Analysis and Regulatory
Southwestern Bell Telephone Company
One Bell Center, 37-Y-01
St. Louis, Missouri 63101

Carol Albenesius
Area Manager-Product Cost
Development and Analysis
Southwestern Bell Telephone Company
One Bell Center, 37-Y-03
St. Louis, Missouri 63101

Mike Auinbauh
Area Manager-Product Cost
Development and Analysis
Southwestern Bell Telephone Company
One Bell Center, 37-H-07
St. Louis, Missouri 63101

Docket No. 14940
Office of Public Utility Counsel
First Request
Information Request No. 1-2
02/20/96

1-2.

Please provide the corresponding LRIC studies (plus all supporting documents, work papers and other analyses) for all rates and charges, recurring and initial non-recurring, that are referenced -- either in footnotes or elsewhere -- in Southwestern Bell Telephone Company, Local Access Tariff Section 4, Sheets 1 through 7, Interim Number Portability. To the extent that these studies are available for inspection and copying in room 310 at 1616 Guadalupe, Austin, Texas, please indicate for each rate or charge the precise binder and tab containing the corresponding studies.

Answer: Information responsive to this request is in part "Highly Sensitive Confidential Information" subject to the Protective Order in this proceeding. The information will be available for review in Room 310, 1616 Guadalupe, Austin, Texas after execution of the proper Protective Agreement. The material will be available between the hours of 8:00 AM and 12:00 NOON and 1:00 PM and 5:00 PM, Monday through Friday on normal

business days. The information can be found in three binders
labeled:

Texas 1993-1994

Incremental Local Switching Access

Cost Study

and

Texas 1993-1994

Incremental Local Transport Access

Cost Study

Texas 1996-1998

Usage Sensitive Local Connection

Cost Study

Texas 1995-1996

Special Access Service

Incremental Unit Cost Study

December 1994

The Incremental Local Switching Access cost study and

Incremental Local Transport Access cost study contain costs for Switched Access service. The result, calculation, and inputs sections are considered Highly Sensitive Confidential and have been marked as such. The information is considered Highly Sensitive Confidential because the unrestricted release of this information to the public could provide competitors with valuable proprietary information that could be used at an unfair advantage.

The Usage Sensitive Local Connection cost study contains costs for the High Capacity Channel Mileage costs. The Special Access Service Incremental Unit cost study contains Voice Grade Channel Mileage costs. This study was completed in 1994 before the cost rule was finalized. All portions of these studies that are considered Highly Sensitive Confidential have been marked as such. The marked information is considered Highly Sensitive Confidential because the unrestricted release of this information to the public could provide competitors with valuable proprietary information that could be used at an unfair advantage.

Southwestern Bell would submit that the information responsive to this request is exempt from disclosure under the Open Records Act pursuant to Sections 552.101, 552.110, and 552.104. The applicable exemptions include trade secrets or commercial or financial information of Southwestern Bell and, if disclosed, could place Southwestern Bell at a competitive disadvantage.

Counsel for SWBT has reviewed the information sufficiently to state in good faith that this highly sensitive information is exempt from public disclosure under the Public Information Act and merits the Highly Sensitive Confidential Information designation.

Docket No. 14940
Office of Public Utility Counsel
First Request
Information Request No. 1-2
Page 5 of 5
02/20/96

Responsible Person: Barbara A. Smith
Area Manager-Product Cost Development,
Analysis and Regulatory
Southwestern Bell Telephone Company
One Bell Center, 37-Y-01
St. Louis, Missouri 63101

Aden Luckett
Area Manager-Product Cost
Development and Analysis
Southwestern Bell Telephone Company
One Bell Center, 37-E-08
St. Louis, Missouri 63101

Mike Auinbauh
Area Manager-Product Cost
Development and Analysis
Southwestern Bell Telephone Company
One Bell Center, 37-H-07
St. Louis, Missouri 63101

Docket No. 14940
Office of Public Utility Counsel
First Request
Information Request No. 1-3
02/20/96

1-3.

For each rate element and charge, recurring and initial non-recurring, that is listed in Southwestern Bell Telephone Company, Local Access Tariff Section 4, Sheets 1 through 7, Interim Number Portability, provide an analysis that identifies the precise amount of contribution that is earned.

Answer: Information responsive to this request is "Highly Sensitive Confidential Information" subject to the Protective Order in this proceeding. The information will be available for review in Room 310, 1616 Guadalupe, Austin, Texas after execution of the proper Protective Agreement. The material will be available between the hours of 8:00 AM and 12:00 NOON and 1:00 PM and 5:00 PM, Monday through Friday on normal business days. The information can be found in a binder labeled:

Texas

Contribution Summary

Associated with INP

Direct and INP Remote

Rate Elements

The contribution is considered Highly Sensitive Confidential because it can be used to identify the price floor incurred by Southwestern Bell Telephone Company to provide each of its services. Disclosure of such information would provide competitors an unfair advantage.

Southwestern Bell would submit that the information responsive to this request is exempt from disclosure under the Open Records Act pursuant to Sections 552.101, 552.110, and 552.104. The applicable exemptions include trade secrets or commercial or financial information of Southwestern Bell and, if disclosed, could place Southwestern Bell at a competitive disadvantage.

Counsel for SWBT has reviewed the information sufficiently to

Docket No. 14940
Office of Public Utility Counsel
First Request
Information Request No. 1-3
Page 3 of 3
02/20/96

state in good faith that this highly sensitive information is
exempt from public disclosure under the Public Information
Act and merits the Highly Sensitive Confidential Information
designation.

Responsible Person: Kevin Chapman
Area Manager-Tariffs and Regulatory
Southwestern Bell Telephone Company
One Bell Center, 37-S-07
St. Louis, Missouri 63101

1-4.

For each rate element and charge, recurring and initial non-recurring, that is referenced in Southwestern Bell Telephone Company, Local Access Tariff Section 4, Sheets 1 through 7, Interim Number Portability, provide a analysis that identifies the precise amount of contribution that is earned. Included in this response should be a contribution analysis for a) the pertinent rates and charges listed on Southwestern Bell Telephone Company, Access Service Tariff, Section 7, Sheets 54 and 76; and b) all Secondary Service Ordering charges that are referenced in footnote 1, of SWBTs Local Access Tariff Section 4, Sheets 7, Interim Number Portability.

Answer: Information responsive to this request is "Highly Sensitive Confidential Information" subject to the Protective Order in this proceeding. The information will be available for review in Room 310, 1616 Guadalupe, Austin, Texas after execution of the proper Protective Agreement. The material

will be available between the hours of 8:00 AM and 12:00 NOON
and 1:00 PM and 5:00 PM, Monday through Friday on normal
business days. The information can be found in a binder
labeled:

Texas

Contribution Analysis

Associated with Secondary

Service Order Charges,

Voice Grade Transport

and DS1 Transport

The contribution is considered Highly Sensitive Confidential
because it can be used to identify the price floor incurred
by Southwestern Bell Telephone Company to provide each of its
services. Disclosure of such information would provide
competitors an unfair advantage.

Southwestern Bell would submit that the information
responsive to this request is exempt from disclosure under
the Open Records Act pursuant to Sections 552.101, 552.110,

and 552.104. The applicable exemptions include trade secrets or commercial or financial information of Southwestern Bell and, if disclosed, could place Southwestern Bell at a competitive disadvantage.

Counsel for SWBT has reviewed the information sufficiently to state in good faith that this highly sensitive information is exempt from public disclosure under the Public Information Act and merits the Highly Sensitive Confidential Information designation.

Responsible Person: Kevin Chapman
Area Manager-Tariffs and Regulatory
Southwestern Bell Telephone Company
One Bell Center, 37-S-07
St. Louis, Missouri 63101

Docket No. 14940
Office of Public Utility Counsel
First Request
Information Request No. 1-5.(a)
02/20/96

1-5.(a).

This question pertains to the Secondary Service Order Charges
(as referenced in footnote 1 of Southwestern Bell Telephone
Company, Local Access Tariff Section 4, Sheets 7.):

- a) Please identify precisely which Secondary Service Order
Charges (as referenced in footnote 1 of Southwestern
Bell Telephone Company, Local Access Tariff Section 4,
Sheets 7) apply;

Answer: The Standard Business Secondary Service Order Charge will
apply.

Responsible Person: Kevin Chapman
Area Manager-Tariffs and Regulatory
Southwestern Bell Telephone Company
One Bell Center, 37-S-07
St. Louis, Missouri 63101

Docket No. 14940
Office of Public Utility Counsel
First Request
Information Request No. 1-5.(b)
02/20/96

1-5.(b).

This question pertains to the Secondary Service Order Charges
(as referenced in footnote 1 of Southwestern Bell Telephone
Company, Local Access Tariff Section 4, Sheets 7.):

(b) Please provide a demonstration that contribution levels
do not exceed 5%, as mandated by the Commissions
Preliminary Order of December 21, 1995, Docket No.
14940, Issue No. 3;

Answer: See SWBT's response to OPUC's First Request, RFI No. 1-4.

Responsible Person: Kevin Chapman
Area Manager-Tariffs and Regulatory
Southwestern Bell Telephone Company
One Bell Center, 37-S-07
St. Louis, Missouri 63101

1-5.(c).

This question pertains to the Secondary Service Order Charges (as referenced in footnote 1 of Southwestern Bell Telephone Company, Local Access Tariff Section 4, Sheets 7.):

- (c) Please provide the corresponding LRIC studies (plus all supporting documents, work papers and other analyses) for all applicable Secondary Service Order Charges (as referenced in footnote 1 of Southwestern Bell Telephone Company, Local Access Tariff Section 4, Sheets 7.) To the extent that these studies are available for inspection and copying in room 310 at 1616 Guadalupe, Austin, Texas, please indicate for each rate or charge the precise binder and tab containing the corresponding studies.

Answer: See attachment.

Docket No. 14940
Office of Public Utility Counsel
First Request
Information Request No. 1-5.(c)
Page 2 of 2
02/20/96

Responsible Person: Barbara A. Smith
Area Manager-Product Cost Development,
Analysis and Regulatory
Southwestern Bell Telephone Company
One Bell Center, 37-Y-01
St. Louis, Missouri 63101

Carol Albenesius
Area Manager-Product Cost
Development and Analysis
Southwestern Bell Telephone Company
One Bell Center, 37-Y-03
St. Louis, Missouri 63101

Docket No. 14940
Office of Public Utility Counsel
First Request
Information Request No. 1-5.(c)
Attachment
128 Total Pages
02/20/96